

July 26, 1993

Lonnie R. Bristow, M.D.
Chair, Board of Trustees
American Medical Association
515 North State Street
Chicago, IL 60610

Dear Dr. Bristow:

I appreciate receiving your letter of July 19, 1993, primarily because it gives me an opportunity to correct some of the misconceptions it contains.

We have asked a federal court in North Carolina to review the EPA's environmental tobacco smoke (ETS) risk assessment because, in addition to exceeding its authority and not following its own guidelines, the EPA "adjusted" science involving ETS to fit its predetermined policies. I am enclosing a copy of our complaint. We believe that a court is the best forum for an objective hearing on the issues, where both sides have the opportunity to present their evidence. What could be fairer?

We both know that scientific research can be distorted, sometimes intentionally, to satisfy the goals of particular interest

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groups. The EPA itself has been viewed as succumbing to this temptation.

In a report to former EPA Administrator Reilly, titled *Safeguarding The Future: Credible Science, Credible Decisions, The Report of the Expert Panel on the Role of Science at EPA*, independent scientists selected by Reilly criticized EPA science as lacking "credible quality assurance, quality control or peer review," and for not giving "sufficient attention to validating the models, scientific assumptions, and databases it uses." The scientists found that EPA improperly ignores science entirely in its early decision-making, and is perceived as "adjusting" science to fit its predetermined policy. We believe that nowhere are these criticisms more justified than in the Agency's actions regarding ETS. ~~And there are other examples [perhaps SCP, Boreilly can supply a few]~~

Philip Morris is not alone in its criticisms of the EPA. I believe you will find that knowledgeable scientists, who have no connections with the industry, disagree with the EPA's conclusions regarding environmental tobacco smoke. For these reasons, I do not understand why you believe it is unconscionable for us to ask a court to review these issues.

I am not enough of an optimist to believe I will change your mind with regard to the other points you make in your letter. Suffice it

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to say that I disagree with the numbers you quote, even assuming the epidemiological studies are correct. And I believe, if you look behind those numbers, you, too, will question their accuracy. We have not callously disregarded any scientific evidence; we have looked at it carefully for more than thirty years.

Finally, with regard to your invitation to walk with you through hospital wards to meet and talk with cancer victims, I regret that I was unaware of your invitation. Had I been, I would have declined, as I do now. I am aware of the terrible toll cancer takes on its victims, their families and friends. No disease is more devastating, and I have seen it in the lives of those I know.

I will be happy, however, to meet with you and arrange for you to meet with others at Philip Morris, to explain our views on the EPA risk assessment in particular, and ETS generally. Perhaps we might even persuade you that we do not "cruelly exploit [consumers] for commercial profit."

I look forward to hearing from you.

Sincerely,

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Michael A. Miles

/lw

enclosure

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